

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

EXHIBIT
A

MAX MARGULIS, individually and)
on behalf of all others similarly)
situated,)
Plaintiff,)
vs.) Case No. 4:14-cv-01131-JAR
SURREY VACATION RESORTS,)
INC., d/b/a GRAND CROWNE)
RESORTS,)
Defendant.)

DEFENDANT SURREY VACATION RESORTS, INC. D/B/A GRAND
CROWNE RESORTS' OFFER OF JUDGMENT TO PLAINTIFF MAX
MARGULIS

Surrey Vacation Resorts, Inc., d/b/a Grand Crowne Resorts ("Surrey"), by and through its undersigned counsel, hereby offers to allow judgment to be entered against it in favor of Max Margulis ("Plaintiff") in the total sum of Fifteen Thousand Dollars (\$15,000.00), inclusive of all costs accrued through the date of this offer, and with reasonable attorney's fees through the date of this offer to be determined by the Court in accordance with the law.

This offer is made pursuant to Fed. R. Civ. P. 68 and is not an admission by Surrey of guilt or liability or an acknowledgment by Surrey of the availability of an award of attorney's fees to Plaintiff. In accordance with Rule 68, if a total

judgment obtained by Plaintiff is not more favorable than the above-stated offer, Plaintiff must pay the costs incurred by Surrey after its making of this offer, which may include Surrey's attorney's fees.

This offer shall be deemed rejected unless accepted within fourteen (14) days of service as specified in Fed. R. Civ. P. 68.

Dated: April 14, 2015

By:

Joseph C. Sullivan

Joseph C. Sullivan

Georgia Bar No. 153098

Admitted Pro Hac Vice

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*Attorneys for Defendant,
Surrey Vacation Resorts, Inc.
d/b/a Grand Crowne Resorts*

CERTIFICATE OF SERVICE

I hereby certify that I have on this 14th day of April, 2015, served a copy of the foregoing *DEFENDANT SURREY VACATION RESORTS, INC. D/B/A GRAND CROWNE RESORTS' OFFER OF JUDGMENT TO PLAINTIFF MAX MARGULIS* to the following attorneys of record by depositing a copy of same in the U.S. Mail with adequate postage thereon addressed as follows:

Cyrus Dashtaki, Esq.
Dashtaki Law Firm, LLC
5205 Hampton Avenue
St. Louis, MO 63109

Dated: April 14, 2015

By: Joseph C. Sullivan
Joseph C. Sullivan
Georgia Bar No. 153098
Admitted Pro Hac Vice

*Attorney for Defendant,
Surrey Vacation Resorts, Inc.
d/b/a Grand Crowne Resorts*